

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOSHUA BRAUNDMEIER and KEVIN WALLACE, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

ANCESTRY.COM OPERATIONS INC., a Virginia Corporation; ANCESTRY.COM INC., a Delaware Corporation; ANCESTRY.COM LLC, a Delaware Limited Liability Company,

Defendants.

CASE NO. 1:20-CV-07390

JUDGE JEFFREY I CUMMINGS

DECLARATION OF JOSHUA BRAUNDMEIER

I, Joshua Braundmeier, declare:

1. I am an adult resident of the state of Illinois.
2. I am a named plaintiff in the above-captioned action and have knowledge of the facts set forth in this declaration. If called as a witness to testify, I could and would be competent to testify to these facts.
3. I am making this declaration in support of Plaintiffs' Motion for Class Certification.
4. Ancestry never requested my consent to use my name and photograph, and I never provided any consent to Ancestry.
5. I am not a paying subscriber, free trial user, or registered account holder with Ancestry.com. I have never agreed to a Terms of Service from Ancestry.com. To the best of my knowledge and recollection, I have never visited www.ancestry.com.

6. I am a proposed Class representative in this lawsuit. I understand I represent a Class of other persons whose names and photographs also appear on www.ancestry.com without their consent. I understand that I must consider, and am obligated to protect, the interests of other Class members in pursuing my claims.

7. As part of my duties as a Class representative, I reviewed the Complaint to ensure the accuracy of the facts as they related to me. I assisted in preparing responses to discovery requests and gathering documents and materials for production. On July 10, 2023, I sat for my deposition. I communicate regularly with my counsel about the progress of this case. I understand I may be called to testify in this case at trial. I am willing and able to continue fulfilling my duties as a Class representative.

8. If this case were not certified as a Class action, it would not be feasible for me to pay an attorney to bring an individual lawsuit to pursue my claims.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of December 2023.



Joshua Braundmeier